

BGK:MMO  
F. #2022V03577

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA,

Plaintiff,

-against-

**WARRANT FOR ARREST OF  
ARTICLES *IN REM***

22-CV-7410

REAL PROPERTY AND PREMISES KNOWN AS  
432 NORTH OAKHURST DRIVE,  
CONDOMINIUM UNIT 103, BEVERLY HILLS,  
CALIFORNIA 90210, AND ALL PROCEEDS  
TRACEABLE THERETO, et al.,

Defendants *In Rem*.

----- X

TO: THE FEDERAL BUREAU OF INVESTIGATION, UNITED STATES MARSHALS  
SERVICE, AND/OR ANY OTHER DULY AUTHORIZED LAW ENFORCEMENT  
OFFICER

WHEREAS, a Verified Complaint *In Rem* was filed on December 7, 2022, in  
the United States District Court for the Eastern District of New York (the “Verified  
Complaint”), alleging, *inter alia*, that:

any and all funds on deposit in Citizens Business Bank account  
number ending in 7135, held in the name of 7D Business Bureau  
Inc., and all proceeds traceable thereto

(the “Defendant Account”), is subject to seizure and forfeiture to the United States of America,  
in accordance with: (a) 18 U.S.C. § 981(a)(1)(A), as property, real or personal, involved in a  
transaction or attempted transaction in violation of 18 U.S.C. §§ 1956 and/or 1957, or property  
traceable to such property; (b) 18 U.S.C. § 981(a)(1)(C), as property, real or personal, which  
constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. § 1344, and/or 50

U.S.C. § 1705(a) (International Emergency Economic Powers Act (“IEEPA”)), or a conspiracy to commit such offenses; and/or (c) 31 U.S.C. § 5335(e), as property involved in a violation of 31 U.S.C. § 5335, or a conspiracy to commit such violation, and property traceable thereto.

WHEREAS, the Court being satisfied that, based on the Verified Complaint, there is probable cause to believe that the Defendant Account is subject to seizure and forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) and 981(a)(1)(C), and 31 U.S.C. § 5335(e), and that grounds for issuance of a Warrant for Arrest of Articles *In Rem* exist pursuant to Rule G(3) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions (the “Supplemental Rules”).

YOU ARE, THEREFORE, HEREBY COMMANDED to seize and maintain custody of the Defendant Account until further order of the Court respecting the same. The United States Marshals Service (“USMS”) and the Federal Bureau of Investigation (“FBI”), their authorized agents, duly designated representatives and/or contractors, shall use their discretion and whatever means appropriate to protect and maintain the Defendant Account; and

IT IS FURTHER ORDERED that the United States Attorney’s Office (“USAO”), the USMS and/or the FBI, or their authorized agents, representatives and/or contractors shall serve upon all potential claimants to the Defendant Account a copy of this Warrant and the Verified Complaint in a manner consistent with the principles of service of process of an action *in rem* under Supplemental Rule G and the Federal Rules of Civil Procedure, and publish notice of the action on the government website, [www.forfeiture.gov](http://www.forfeiture.gov), in the Eastern District of New York, pursuant to Supplemental Rule G(4); and

NOTICE IS HEREBY GIVEN that all persons claiming an interest in the Defendant Account shall file their verified claim and statement of interest under penalty of perjury within thirty-five (35) days after service of the Verified Complaint or, as applicable, no later than thirty (30) days after the final date of publication of notice of the filing of the Verified Complaint, whichever is earlier, or within such additional time as the Court may allow, pursuant to 18 U.S.C. § 983(a)(4) and Supplemental Rule G(5). In addition, any person having filed such a claim or statement of interest must also file an answer to the complaint no later than twenty-one (21) days after the filing of the statement. All claims and answers must be filed with the Office of the Clerk, United States District Court for the Eastern District of New York, 100 Federal Plaza, Central Islip, New York 11722, with a copy thereof sent to Madeline O'Connor, Assistant United States Attorney, United States Attorney's Office for the Eastern District of New York, 610 Federal Plaza, 5<sup>th</sup> Floor, Central Islip, New York 11722.

Dated: Brooklyn, New York

\_\_\_\_\_, 2022

---

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK